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January 4, 2021

BY ECF

Hon. J. Paul Oetken
United States District Judge
United States District Court
40 Foley Square, Room 2101
New York, New York 10007

Re: In re CBS Broadcasting, Inc., 20-MC-739 (JPO)

Your Honor:

We represent defendants in the underlying matter In re Watts Coordinated Pretrial Proceedings, Case No. 19-cv-1717, pending in the U.S. District Court, Northern District of Illinois. The instant matter is before Your Honor on the motion by non-party CBS Broadcasting, Inc. ("CBS") to quash defendants' subpoena *duces tecum*, in connection with the underlying matter. We write to request an extension of the briefing schedule of CBS's motion to quash, set by the Court's order of December 15, 2020 (Dkt. 11), by twenty-one (21) days, as follows: (1) defendants' opposition to be served and filed on or before January 29, 2021, instead of the current due date of January 8, 2021; and (2) CBS's reply papers, if any, to be served and filed on or before February 10, 2021, instead of the current due date of January 20, 2021. This is the first request for an extension of these deadlines. Movant CBS kindly consents to this application. We request this extension because our firm's Chicago office, which is handling the underlying matter, has encountered scheduling conflicts with deposition deadlines in other cases, including two wrongful conviction cases, as well as other pending litigation in which we represent the City of Chicago.

Respectfully submitted,

/s/

Arthur G. Larkin, Esq.
HALE & MONICO LLC

AGL/m

cc: All Counsel (by ECF)